

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM (formerly known as
ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEXIA'S MOTION TO STRIKE ADDITIONAL LETTERS ROGATORY
QUESTIONS FILED BY PLAINTIFFS**

Defendant Dexia Bank Belgium, by and through its counsel, hereby moves to strike additional letters rogatory questions filed by Plaintiffs on August 14, 2006.

In support of this motion, Dexia submits the accompanying Memorandum of Law and the Declaration of Jeff E. Butler dated September 8, 2006.

Wherefore, Dexia respectfully requests that this motion to strike be granted in full.

Dated: September 8, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO

By: /S/ Eóin P. Beirne
Peter M. Saparoff (BBO# 441740)
Breton Leone-Quick (BBO# 655571)
Eóin P. Beirne (BBO# 660885)

One Financial Center
Boston, MA 02111
Tel: (617) 542-6000
Fax: (617) 542-2241

James B. Weidner
Jeff E. Butler
CLIFFORD CHANCE US LLP
31 West 52nd Street
New York, NY 10019-6131
Tel: (212) 878-8000
Fax: (212) 878-8375

Counsel for Dexia Bank Belgium

Local Rules 7.1(A)(2) Certification

The above-signed counsel hereby certifies that counsel for the parties have conferred and in good faith negotiated and are unable to resolve the issues within this motion.

CERTIFICATE OF SERVICE

I, Eóin P. Beirne, hereby certify that this document will be filed through the ECF system, which filing will constitute service of the document upon all registered ECF users as identified on the Notice of Electronic Filing (NEF). A paper copy of this document has been mailed in accordance with Fed. R. Civ. P. 5(b) to all those case participants not identified on the NEF as electronic recipients.

/S/ Eóin P. Beirne

Dated: September 8, 2006